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April 12, 2010

VIA UPS OVERNIGHT DELIVERY

Gail Mitchell, Deputy Director
Water Protection Division
U.S. EPA Region 4
Atlanta Federal Center
61 Forsyth Street
Atlanta, Georgia 30303-8960

**Re: October 6, 2009, Information Request – Section 308 of the Clean
Water Act - Dalton Utilities Land Application System**

Dear Ms. Mitchell:

This letter provides information from Dalton Utilities in connection with its ongoing responses to EPA's October 6, 2009, Section 308 of the Clean Water Act request (the "Request") addressed to Mr. Don Cope, President and CEO of Dalton Utilities. The enclosures are a letter dated April 12, 2010, with a certification signed pursuant to the Request. The enclosed information is responsive to Dalton Utilities commitment to work with the Sustainability Division of the Georgia DNR and UGA to evaluate current PFC usage by the industrial dischargers into the Dalton Utilities wastewater system.

Please contact me if have any questions regarding the information supplied pursuant to the Request.

Sincerely,



Lee A. DeHihns, III

LAD:gba
Enclosures

LEGAL02/31578197v15



April 12, 2010

Ms. Gail Mitchell, Deputy Director
Clean Water Enforcement Branch
Water Protection Division
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, SW
Atlanta, GA 30303-8960

Re: Information Request Pursuant to Section 308 of the Clean Water Act
Analytical Sample Results

Dear Ms. Mitchell,

As previously reported to you, Dalton Utilities partnered with the Sustainability Division of the Georgia Department of Natural Resources (DNR) and the University of Georgia (UGA) to conduct a survey to evaluate the current usage and potential levels of Perfluorinated Compounds (PFCs) in the industrial discharges into our wastewater collection system. Sampling as part of this project began in November 2009 and was completed in early February 2010. All permitted industrial users under Dalton Utilities Pretreatment Program that were in operation during this timeframe were sampled as part of this project. A list of these permitted industrial users is attached herein for your records as Attachment A.

The final report from the Sustainability Division summarizing the project and subsequent data is attached herein as Attachment B. The analytical results of these sampling events are contained in Attachments C, D, E, F, G, and H which are provided herein as bound reports titled Analytical Report of Fluorochemical Characterization of Aqueous and Solid Samples MPI Report No. L0019519, L0019582, L0019716, L0019874, L0020078, and L0020270, which contain 424, 650, 745, 819, 697, and 844 pages, respectively. Upon review, you will notice the data supports the statements from industrial representatives that PFCs are in the process of or have been phased out of the local manufacturing processes.

If you have any questions, please contact me at 706-529-1091 or dcope@dutil.com.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,



Don Cope
President & CEO

Attachments (8)

- c: Mr. Allen Barnes, Georgia Environmental Protection Division (cover letter only)
 - Dr. Becky Champion, Georgia Environmental Protection Division (cover letter only)
 - Dr. Marlin Gottschalk, Sustainability Division Georgia Department of Natural Resources (cover letter only)
 - Dr. Bert Langley, Georgia Environmental Protection Division (cover letter only)
 - Lee A. DeHihns, Esq.
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